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12 **UNITED STATE DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 * * *
15 EMPLOYERS FIRE INSURANCE) Case No.: 2:10-cv-001109-JCM-VCF
16 COMPANY)
17 Plaintiff/ Counter-Defendant,)
18 vs.)
19 BASIC FOOD FLAVORS, INC.)
20 Defendant/Counter-Claimant.)
21 _____)
22)
23)
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28)

16 **STIPULATION (AND PROPOSED ORDER) TO EXTEND**
17 **THE GLOBAL SETTLEMENT DEADLINES**

18 Plaintiff/Counter-Defendant EMPLOYERS FIRE INSURANCE COMPANY (hereinafter
19 “EMPLOYERS”) and Defendant/Counter-Claimant BASIC FOOD FLAVORS, INC. (hereinafter,
20 “BFF”), (collectively, the “Parties”), by and through their respective counsel of record submit
21 this stipulation to extend the global settlement deadlines, except for the March 27, 2012
22 Settlement Conference, as submitted and entered by this Court on January 26, 2012. [Doc.
23 No. 65]. The Parties recognize the need to provide ample time for the interested third party
24 claimants (hereinafter, “Claimants”) to participate in the discussion of BFF’s settlement
25 proposal until such time that a mutual agreement has been reached and an eventual
26 resolution of the claims.

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1 The following dates currently govern this case:

2 February 3, 2012: Basic Food Flavors, Inc. submits its final proposal to
3 Buccino and Associates.

4 February 6, 2012: Buccino & Associates delivers ballots for approval by
5 voting by Claimants.

6 February 16, 2012: Claimants return ballots to Buccino & Associates

7 February 22, 2012: Buccino & Associates certifies results of voting to the
8 Court via declaration.

9 March 27, 2012: Settlement conference

10 The Parties propose the following dates:

11 February 6, 2012: Basic Food Flavors, Inc. submits its proposal to
12 Buccino and Associates.

13 February 8, 2012: Buccino & Associates delivers initial proposal to
14 Claimants for comments

15 February 15, 2012: Last day for Claimants to provide comments

16 February 20, 2012: Basic Food Flavors, Inc. submits its final proposal to
17 Buccino & Associates

18 February 22, 2012: Buccino & Associates delivers proposal to Claimants
19 for approval by voting

20 February 29, 2012: Claimants return ballots to Buccino

21 March 7, 2012: Buccino & Associates certifies results of voting to the
22 Court via declaration.

23 March 27, 2012: Settlement Conference

25 The Parties therefore request the Court to adopt the newly proposed schedule and
26 maintain the March 27, 2012 Settlement Conference on the Court's calendar.

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1 DATED: February 3, 2012
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3 WILSON ELSER MOSKOWITZ EDELMAN
4 & DICKER, LLP

5 By: /s/ Joseph F. Bermudez

6 Joseph F. Bermudez, Esq. (*Pro hac vice*)
7 Suzanne M. Meintzer, Esq. (*Pro hac vice*)
8 1512 Larimer Street, Suite 550
9 Denver, CO 80202
10 *Attorneys for EMPLOYERS FIRE
11 INSURANCE COMPANY*

12 DATED: February 3, 2012

13 LIPSON, NEILSON, COLE, SELTZER &
14 GARIN, P.C.

for P. Garin

15 By:

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21 INC.*

22 **ORDER**

23 Pursuant to the above Stipulation,

24 IT IS HEREBY ORDERED that the Stipulation is adopted as the order of this Court.

25 DATED this 6th of February, 2012.

Carole Seltzer

26 U.S. MAGISTRATE JUDGE

27 Respectfully submitted by:

28 LIPSON NEILSON COLE SELTZER & GARIN, P.C.

for P. Garin

By:

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